

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

## Alexandria Division

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO  
DEFENDANT'S MOTION TO COMPEL**

The United States of America, by and through its attorneys, G. Zachary Terwilliger, U.S. Attorney for the Eastern District of Virginia, William G. Clayman, Special Assistant United States Attorney (LT), and Jay V. Prabhu, Assistant United States Attorney, respectfully moves the Court to permit the government to file a response to the defendant's motion to compel [Dkt. No. 137] and supplement to his motion to compel [Dkt. No. 140] on or before December 18, 2020. In support thereof, the government states as follows:

1. On November 27, 2020, the defendant filed a motion to compel. Dkt. No. 137. Pursuant to Local Criminal Rule 47(F)(1), the government's response to this motion is due on or before December 11, 2020.

2. On December 5, 2020, the defendant filed a supplement to his motion, elaborating on the arguments contained in his motion to compel and attaching as exhibits to this filing 12 documents. Dkt. No. 140.

3. In order to fully respond to the defendant's original motion as well as the additional information and documents included in his supplemental filing, the government respectfully requests that the Court permit the government to file its response on or before December 18, 2020.

WHEREFORE, the United States respectfully requests that the government be permitted to file a response to the defendant's motion to compel [Dkt. No. 137] and supplement to his motion to compel [Dkt. No. 140] on or before December 18, 2020.

Respectfully submitted,

G. Zachary Terwilliger  
United States Attorney

/s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 10, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to the parties of record.

By: /s/

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